

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DEBORAH FRAME-WILSON, *et al.*, on behalf  
of themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

STIPULATED MOTION AND  
ORDER REGARDING SEALING  
OF PLAINTIFFS' MOTION FOR  
AN ORDER REGARDING  
PROTECTIVE ORDER  
STANDARDS APPLICABLE TO  
CLAW BACKS IN PLAINTIFFS'  
CASES

ELIZABETH DE COSTER, *et al.*, on behalf of  
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:22-cv-00965-JHC

The Parties have met and conferred with respect to Plaintiffs' intended Motion for an Order Regarding Protective Order Standards Applicable to Claw Backs in Plaintiffs' Cases, and anticipate that their briefs, declarations, and exhibits will quote from and/or describe in detail a significant amount of information that has been designated as Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon. Accordingly, in order to ensure that such materials are treated appropriately under the applicable protective order, and to reduce burdens on the Court, the Parties, pursuant to LCR 7(d)(1) and 10(g), and their respective counsel, hereby stipulate and agree to the following procedure for filing and sealing in connection with the supplemental motion to compel briefing, subject to the Court's approval.

1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its brief, declarations, exhibits, and all other evidence on which that Party relies which contain material designated Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon.

2. By July 7, pursuant to LCR 5(g), the Parties will meet and confer and, as appropriate, file (1) public versions of their briefs, with necessary redactions, and (2) corresponding motion(s) to seal pursuant to LCR 5(g)(3). The Party seeking to maintain material under seal (or under redaction) shall be the movant for purposes of any such motion(s) to seal associated with the Parties' Supplemental Papers.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

DATED June 3, 2025.

Respectfully submitted,

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*Attorneys for Amazon.com, Inc.*

1 IT IS SO ORDERED.

2  
3 June 3, 2025

4 Dated



John H. Chun

United States District Judge